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March 23, 2018

**Via ECF**

Hon. William J. Martini, U.S.D.J.  
U.S. District Court, District of New Jersey  
M.L. King Jr. Federal Building & Courthouse  
50 Walnut Street - Room 4076  
Newark, NJ 07102

**Re: Michael Cioffi v. Borough of Englewood Cliffs, Mario M. Kranjac, Carrol  
McMorrow, Nunzio Consalvo, and Mark Park.  
Docket No.: 2:16-cv-04536-WJM-MF**

Dear Judge Martini:

This firm is counsel for Defendants, the Borough of Englewood Cliffs, Nunzio Consalvo, and Mark Park, in the above-referenced matter. We write in response to the Court's letter of February 28, 2018 (ECF #56), disclosing Richard Malagiere's prior representation of Your Honor in a trademark matter. After reviewing this matter with our clients, we respectfully join in the request of co-Defendant, Carrol McMorrow, through Eric Harrison's letter of March 16, 2018 (ECF #65), requesting this matter be transferred to a different Judge.

We thank the Court for its consideration of this request

Respectfully submitted,

CARMAGNOLA & RITARDI, LLC

*/s/ Domenick Carmagnola*  
DOMENICK CARMAGNOLA  
A Member of the Firm

DC:mz

cc: Richard Malagiere, Esq. (via ECF)  
Eric L. Harrison, Esq. (via ECF)  
Joseph Tripodi, Esq. (via ECF)  
Robert L. Galantucci, Esq. (via ECF)